1   IN THE UNITED STATES DISTRICT COURT
       FOR THE WESTERN DISTRICT OF NORTH CAROLINA
2   CHARLOTTE DIVISION

3

4
UNITED STATES OF AMERICA   )
5 ex rel. TARYN HARTNETT, and)
DANA SHOCHED,   )
6   )
             Plaintiffs,   )
7   )
             -v-   ) CIVIL FILE NO.
8   ) 3:17-CV-37
PHYSICIANS CHOICE LABORATORY) (CONSOLIDATED WITH
9 SERVICES, DOUGLAS SMITH,   )   CIVIL FILE
PHILIP McHUGH and   )   NO. 3:17-CV-46)
10 MANOJ KUMAR,   )
)
11   Defendants.   )

12

13   The videotaped deposition upon oral

14 examination of GREGORY SCOTT MASIMORE, M.D., a witness

15 produced and sworn before me, Julie A. Nicholson, RPR,

16 CRR, Notary Public in and for the County of Hamilton,

17 State of Indiana, taken on behalf of the Plaintiffs at

18 the offices of Dentons Bingham Greenebaum, LLP, 2700

19 Market Tower, 10 West Market Street, Indianapolis,

20 Indiana, on September 25, 2020, at 10:04 a.m.,

21 pursuant to the Federal Rules of Civil Procedure.

22
                STEWART RICHARDSON & ASSOCIATES
23   Registered Professional Reporters
              One Indiana Square, Suite 2425
24   Indianapolis, IN 46204
                     (317)237-3773
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 1  Q  Did you also work with a Dr. Yunus Shah there?

 2  A  I did.  Not -- we worked independently.  We both

 3     worked for Dr. Tiwari, but I did not actually work

 4     with Dr. Shah, per se.

 5  Q  Why did you leave Dr. Tiwari's practice?

 6         MR. GAERTE:  Mr. Johnson, good morning.  My

 7     name is Michael Gaerte.  We spoke off record.  I

 8     represent Dr. Masimore.  At this point, I'm going

 9     to interject and object to the question and

10     instruct Dr. Masimore to not answer that question

11     based upon his Fifth Amendment privilege to avoid

12     incrimination.

13  Q  Are you relying on the advice of your counsel to

14     decline to answer that question?

15  A  I am.

16  Q  Do you have an office manager at Pain Management

17     Solutions?

18  A  I do not currently.

19  Q  Did you have one previously?

20  A  Yes.

21  Q  Who was that?

22         MR. GAERTE:  Same objection, Mr. Johnson, and

23     same instruction to my client.  I can reincorporate

24     the longer record.  I don't think you need me to.

25         MR. JOHNSON:  That's fine.
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